



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Building
26 Federal Plaza, 37th Floor
New York, New York 10278

May 22, 2025

By ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED
(p. 2)

**Re: *United States v. Jimenez Perez*, 09 Cr. 159 (JHR)
Jimenez Perez v. United States, 25 Cv. 3400 (JHR)**

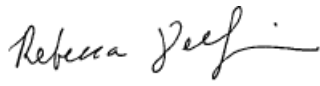
Dear Judge Rearden:

The Government respectfully requests an extension of time to respond to the defendant's emergency motion for a temporary stay of removal proceedings, filed on May 9, 2025 (the "Motion"). 25 Cv. 3400, Dkt. 10.

On May 14, 2025, the Court ordered the Government to respond to the Motion by May 20, 2025, and the defendant to reply by May 23, 2025. At that time, the undersigned counsel for the Government had not yet entered an appearance in the above-captioned cases, and did not see the Court's order. Accordingly, the Government requests a brief extension to consider the Government's position on the Motion and to draft its response. The Government respectfully requests leave to file its response on or before May 27, 2025, one week before the defendant's removal hearing in immigration court on June 3, 2025.

Respectfully submitted,

JAY CLAYTON
United States Attorney

by: 

Rebecca Delfiner
Assistant United States Attorney
(212) 637-2427

cc: Eduardo H. Jimenez Perez (by ECF and mail)

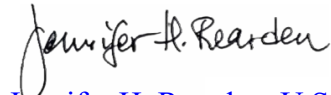
Application granted in part. Given the short time remaining before Petitioner's June 3, 2025 hearing, the Court hereby extends the Government's deadline to respond to Petitioner's request for an emergency stay *nunc pro tunc* to **May 25, 2025**. The Government shall serve a copy of its response and of this Order on Petitioner by overnight courier, for delivery on **May 27, 2025**. Proof of such service shall be filed on the docket.

Petitioner's deadline to file a reply in further support of his motion is extended to **May 29, 2025 at 4:00 p.m.** If possible, Petitioner should submit the reply as an attachment in PDF format to Pro_Se_Filing@nysd.uscourts.gov, per the instructions contained in Appendix C of the Court's ECF Rules & Instructions available at <https://www.nysd.uscourts.gov/electronic-case-filing>, or drop off the reply in the drop box located in the lobby of the U.S. Courthouse at 500 Pearl Street, New York, NY, 10007. **Petitioner is cautioned that sending his submission by regular U.S. mail could result in the Court receiving it after the June 3, 2025 hearing.**

To the extent that the Government obtains information regarding U.S. Immigration and Customs Enforcement's near-term plans with respect to detaining Petitioner or seeking his removal, including information that might bear on the instant briefing schedule, the Government shall inform the Court forthwith. *See, e.g., Torres-Jurado v. Trump*, No. 19 Civ. 3595 (AT) (S.D.N.Y. Apr. 24, 2019), ECF No. 8.

The Clerk of Court is directed to terminate ECF No. 19.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Jennifer H. Rearden". The signature is fluid and cursive, with the first name being the most prominent.

Jennifer H. Rearden, U.S.D.J.

Dated: May 22, 2025